

Appendix "A"

Comment Letters

Issues from 7/8/99 Public Hearing

3223 Sugar Ridge Road
Meadow Vista, CA 95722

May 12, 1998

Russ Henly, Policy Analyst
The Resources Agency
Department of Forestry and Fire Protection
1920 20th Street
Sacramento, CA 95814

SUBJECT: Comments on Notice of Preparation of a Draft Program Timberland
 Environmental Impact Report

RE: PROJECT TITLE: Program Timberland Environmental Impact Report for the Meadow
 Vista Fuel Reduction Program

Dear Mr. Henly:

As Rich Gresham indicated at the Meadow Vista MAC meeting on May 7, 1998, the time frame for receiving comments on the above noted NOP has been extended to May 15, 1998.

Within the limited time allocated by the MAC chairperson, much information was presented about the proposed Program Timberland EIR. emphasizing that "the PTEIR process will reduce additional paperwork and costs to individual landowners while achieving fire protection goals." For those landowners wishing to sell or barter trees as a "timber product", the PTEIR provisions will provide the basis of the checklist of mitigation measures for the "streamlined" timber harvest plans. With this very abbreviated overview, I would like to comment on the NOP.

Re: PART III, 1.b) What is the mitigation monitoring program? Is it referred to in the PTEIR? What is the process by which "modification of mitigation measures contained in the Meadow Vista Community Plan Final EIR" would be accomplished? Is a public hearing a part of the process? Who oversees any compliance with the stated mitigations and the PTEIR? My concern comes from a personal experience with a neighbor at the time of implementing his fuel reduction Conservation Plan who had fuels removed on neighboring properties without the owners' permissions, as well as doing it in a manner that was contrary to the advise we had all received from CDF.

Re: 3.e) and f) Living near the ridge top of Sugar Pine Mountain, the southern border of the current program area and scheduled for "shaded fuelbreak" treatment, this item on the checklist warrants attention. This proposal could impact roadways as well as structures, as well as vegetation. Our experience within a twenty acre "neighborhood" that has undergone fuel reduction by various plans and means—men + chainsaws, mechanical masticator and front-loaders uprooting brush—has given us a first hand look at the processes, and the results. Disturbed soils have led to lost topsoil and clouding the increased water run-off after non-tree vegetation removal both along road cut banks and on broad slopes. Soils saturated with water and "shut tight" with shrink-swell potential maxed out have allowed French drains to backup and flood ground-level rooms as well as affected well-water quality due to hydrostatic pressures.

With only the thin layer of topsoil over granite just down slope from the ridge top's deeper soils, subterranean water courses find their way down hill in the most curious of routes along and under rocks to fountain and bubble out midway in cut banks. Collapsed and eroded soil on embankments and slopes is not just from the attack of "surface" elements like wind and rain, but from uprooted vegetation. Changes in drainage due to new driveways and culvert placements aside (we lost a large, older ponderosa pine when a neighbor focused a driveway drainage to a single culvert), the mountain side has lost smaller trees, toyon and manzanita bushes due to changes in amounts of surface and subterranean water, redirected watercourses, and to more rapid drainage amounts that undermine root holds as well as the destruction of the root networks between bushes when neighboring bushes were removed. "Landslides and mudflows" types of concern increase with every rainstorm as rapid and often high run-offs increase the mountain's intermittent streams, and can easily close culvert crossings, and potentially undermine these and the banks along routes used for "health and safety" passage as well as every day events. Water quality is also of concern. What are the possible mitigations?

Re: 3.i) Sugar Pine Mountain is granodiorite pluton unique to this region of the Sierra Foothills. From the lichen and moss specific to its granitic composition to those outcroppings providing panoramic views, the ridge is based on a unique treasure. "Please do not disturb" is the sign that equipment and operators need to heed, and not scar these beauties that are already fire-safe barriers. (See comments re: Cultural Resources re: possible bedrock mortars on Wooley Creek.)

Re: 4. Water. As noted in the NOP, there are considerable concerns about this element.

See Comments Re: 3.e) and f)

Re: 4.a) An appropriate place for "public awareness" and education is the Shaded Fuelbreak being created along Placer Hills Road near the I-80 interchange. Areas where fuel was removed in June, 1997 (scary in that the debris piles stayed along the roadway most of the summer) had grasses return and have not shown very much erosion and minimal sediment in the run off during this endless El Nino rainy winter. Areas nearer the freeway that were cleared this winter and the brush has been burned this month and last exhibit many more "debris-slides" into the new paved gutters exposing wet channels down the face of these old cut banks.

Re: 4.c) The sediment levels in many streams and creeks leaving the Winchester subdivision currently under construction have risen to the point of "red-orange" alerts. Granted, the timing of these major openings in the soils and the lack of implementing methods to minimize soil erosion have contributed to the degradation of water quality. How will the PTEIR and the checklist THP prevent such lapses--supervise and minimize extensive cuts or excavations? What measures will be put in place to monitor and correct the run-off of pesticides, herbicides and fertilizers that will be used in any maintenance and revegetation measures?

Re: 4.f) and h) Will the change in quantity of ground waters adversely affect local septic systems? Those already in place in low-lying areas are a concern of the Environmental Health Department. When soils are supersaturated from increases in runoff, septic system failures could affect the quality of ground water, and well water. Also, too much ground water recharge can threaten the health of native black oaks, for example.

Re: 4.i) As Maureen Gilmer in California Wildfire Landscaping emphasizes, water to the plants is critical for any fire resistance. Increases in irrigation will affect demand on public water supplies as well as private wells. With the increase in sun exposure as the tree canopies are opened and the loss of cooling transpiration from the removal of all levels of vegetation, soils

themselves are now exposed to higher temperatures and will dry out, pulling out ground water. Encouraging the use of mulches, naturally available and applied, and amending soils with moisture-holding compost should definitely be a “mitigation”. Any plans to create a bio-mass collection and/or composting operation at the transfer station for the non-lumber debris that is removed from the plan site? Making the decomposed materials available to local residents would save on transport costs, reduce use of fossil fuels and landfills. And help Air Quality--see below.

Re: 5. a, b, d) Disturbed soil problems discussed above apply to areas that have experienced burns--controlled or otherwise. In addition, most invasive natives like poison oak and non-native plant populations like annual European grasses and star thistle prefer such conditions of reduced competition, so you open up the landscape to competition from less desirable sorts. What agency can help anticipate and head them off? The poison oak has flourished especially in our fuel reduction/vegetation clearings. I would hate to be exposed to the oils in the smoke when any type fire occurs. Or cut a fire line or horse trail through star thistle! Do the firefighters have any suggestions?

Presettlement emissions in Meadow Vista were probably minimal from smoke from campfires, fires started by lightening, or even set by resident Nisenan after they had protected the trunks of ponderosa pines with wet sand at the bases or cleared the tall grasses under the acorn-bearing oaks. Such is not the case today with the network of roads for this bedroom community. The more odiferous automobile emissions are detectable at the MV park when the wind is right or when you are walking along one of the trails along our roads. Residents are still burning on “no burn” days. Removing fuels will prevent the major and widespread occurrence of air pollution that usually accompanies a wildfire. But what will filter and help to purify our local atmosphere daily as it is subjected to our pollutants and those of the Sacramento valley? TIME, May 4, 1998: “60,000 sq. mi. Expanse of forest destroyed around the globe each year.” “Think globally, act locally.” And trees are not the only plants that filter the air, produce the oxygen we depend on or fix the minerals and soils.

Re: 5.c) Removal of vegetation has affected our micro-climate and that of the neighbors. The “cool evening breezes” of summer are not as cool. As the air tumbles down slope to the river from the ridge, it crosses the superheated rock mass now less shaded since the tree-sized manzanita and toyon were removed uphill. The thermal mass heats and cools now in a “shallower” cycle, but our energy usage to cool the house in the summer is increasing markedly. More and more, we have had to use the central air conditioning and not the “open windows” method. More smoke from burning debris would have the same affect on A/C usage, I would guess. Reduced transpiration and moisture loss from fuel reduction measures should be offset with increased irrigation with increased landscape management practices. We have not had success fending off the rabbits, deer, and noisy skunks, so we have not had much luck introducing higher moisture landscaping. So, we just manage the native communities that are adapted to no or low water. Not as fire smart, but watering would kill them and create a greater hazard.

Re: 7.a) – c) “Wildland/rural intermix” is the description that the Meadow Vista area has received in the Fuel Reduction Program’s The Defensible Space and Healthy Forest Handbook. This handbook also lists and maps MV’s multiple vegetation classifications, based upon the California Department of Fish and Game’s Wildlife Habitat Relationships System (WHRS). See Handbook pages 103-104. Multiple agencies worked to on this survey. The PTEIR cites valley oak woodlands and riparian communities as those most impacted by the program. Please explain

what are the specific mitigations that will protect oaks of all species? And what is being done to reestablish oaks? The initial removal of browse for the resident deer has them eating wildflowers, the new leaves on the resprouting toyon, and young oak trees. If only they would gorge themselves on the prolific poison oak. Will any effort be made to collect seeds from the trees to be removed from the shaded fuelbreaks to provide for species diversity when these nursery and mother trees die and few of their youngest offspring will have survived in the fuel removal process that is altering their habitat? In the February, 1990 snow storm, over 30" of cold, wet, heavy snow fell in less than a day at our 2,000' elevation. Almost an entire generation of middle-aged ponderosa pine trees in the 20 acre area surrounding our house were wiped out when they snapped off half way up. As other area pines have succumbed to bark beetle infestations and mechanical damage, we appreciate the need for "resistant" strains to be protected and perpetuated.

Re: 7.d) So the PTEIR will defer to Section 404 of the Clean Water Act? See comment re 9.e).

Re: 7.e) Along Placer Hills Road, we should start our own version of the Calaveras County Jumping Frog Jubilee--only with squirrels. To leap from treetop to treetop in a Shaded Fuel Break will be no mean feat. I am afraid there will be even more "sail" (read squashed) squirrels along Meadow Vista Road if the border of trees that exists is further thinned and opened (25' of roadway + shoulders + cleared canopy). Worse will be the typical wild gyrations and multiple changes in directions a squirrel can go through just to cross the road. Cars usually win—if deer are not contestants, too. Fuel reduction is removing the wildlife safety zones along the "edges" where open space meets the forest. Meadows will be visited by those insect and seed foraging birds that can find cover quickly from overhead predators in shrubs and trees. Stand-alone trees whose lower 9-19 feet of branches have been removed just do not present the same safe haven. As the Plan is to protect the environment from wildfires, recognize that removal of a plant species from an area will relocate its inhabitants. A beetle that lived in the manzanita now lives in and on our house; the quail have only one corridor up and down our mountain left that provides them the shrub coverage and snacks in the leaf litter. Ants nesting in the dead wood and hollows of trees head for your house and hose water when the water source in the hollow is removed with their "unhealthy" tree. Termites are everywhere so supersaturated soils send them into a house's wood. Out come the pesticides and sprays that will wipe out even the beneficial pollinators your vegetable garden needs, or contaminate your watershed. Addressing the problems in the PTEIR is to help "look before you leap" and avoid creating a more unmanageable set of problems, and have to spend more money than a harvested tree(s) will "earn" for you at a lumber mill to correct the new problem.

Re: 8.a) Who will pay for transport of brush chips to a bio-mass plant? Will more trees be cut/marketed just to cover costs? To help reduce costs and pollution from transport vehicles, could the chips be safely stored and loaded in big batches? What became of the idea to have a chipper "visit" neighborhoods to help reduce transportation off-site? Any sales to nurseries and landscapers as mulch? Investigate those possibilities! Would the CCC aid those with older residences that are not designed to take advantage of the "increase in passive solar potential" from more open defensible space, or at least help insulate their homes to be cooler in the summer? Unfortunately, there will be a potential for water shortages if we all get busy irrigating our new fires safe landscaping. Will the Meadow Vista Water Agency have sufficient summer storage for both the increase in population at Winchester and its golf course and the Plan implementation?

Re: 8.c) I have come to regard topsoil as a mineral resource. Secure what we have. A hundred years of passive decomposition in our climate to create about an inch of soil makes it a valuable resource. The removal of the “future” nutrient sources and their burning seems counterproductive to the health of the forest. Pine branches contain 60% of the tree’s nitrogen (see Handbook). How can we best make this available on site from the “slash”?

Re: 9.a) The use of pesticides and herbicides during the initial phase and during the maintenance phase of the Plan has to be addressed. This will be difficult as the affects and accumulations of these chemicals in soils, in the food web and in the watershed are still under study. Chemicals will be used to treat tree stumps to stop resprouting—herbicide use is less labor intensive and erosive than grubbing them out. Foliar applications are even easier though not recommended as overspray can create more dead matter.

Re: 9.c) See comment Re 9.a). With fewer plants along our roadways to filter and process pollutants, will the oil-laden water spray from the roadway then become a greater bio-hazard as it will enter the watershed directly? Any continued chemical treatment or burning for the maintenance of the Plan will also present health hazards--increased number of exposures, cumulative affects, and new exposures to old and new threats. Poison oak lurks in all three forms and its herbicidal controls need to be reapplied over the years. You are exposing yourself to possible contact with its oils while trying to eradicate it as well as to possible inhalation of the toxic chemicals of a spray or skin contact with the solution. Allergens abound. Inviting in the non-native grasses and opening up our “air routes” with less plant material to trap pollens may see an increase in reactions, unless the sources are removed in the process. Residents along the Shaded Fuelbreak routes may be exposed to greater levels of traffic-related pollutants (combustion emissions, noise and light) after the initial phase. See NOP item 13 as “peace of mind” and “sense of security” will be altered.

Re: 11.a) Increase in actual local fire suppression teams may be needed. See CDF logs for late June, 1997. Two wildland fires stemming from two MV residents conducting fuel reduction debris burning—one rekindled from a legal burn and one direct from an illegal burn—required full CDF ground crews and borate bombers to extinguish them. Luckily, the outbreaks were within hours of each other so the crews and heavy equipment were still in the area. The illegal one less than a quarter of a mile downslope from our house sent me packing, and showed how ineffective our roof and downslope sprinklers are against the quantities of smoke. Cringe at the mere thought of flames approaching. And just how terrific it is to have accurate borate bombers and great hardworking ground support when you need them. ☺

Re: 11.e) The phones and code enforcers of Air Quality will be busy monitoring the effects of all the burning--both legal and illegal.

Re: 12.a) Do the 20’+ brush-free swathes that PGE now maintain either side of their lines count as “Unshaded Fuelbreaks” any where in the Plan?

Re: 12.c) Increased demand from existing water customers to irrigate initial replanting of vegetative screening along roads and maintain all fire-safe landscaping. Even to reestablish native species requires 2-3 years of drip irrigation.

Re: 12.f) See comment Re: 8.a) above

Re: 12.g) See comment Re: 12.c) above for well water use

Re: 13.a,b,c) The NOP PTEIR response says it well. For most of the residents and visitors to our community, the most far-reaching and greatest area of impact of the Plan is probably on “aesthetics”. Already noticeable is the glow of the Auburn lights at night, silhouetting the trees on the ridgeline. That may be the only redeeming merit of night lights—to silhouette the trees. It does not help star gazing. You would be amazed at the number of yard lights near and far whose beams penetrate the rural nights. But remove trees and brush, and you may go into a fit of remorse when you see your neighbor’s lights as bright as your own. You may even be surprised that the driver of the car in your front yard is there when he came around the corner and was blinded by your neighbor’s lights. So much for a sense of security from well-lit places. And it sounded like he was driving into your bedroom with the sound waves now able to travel uninterrupted from the road to your house. I will not dwell on the screening of “yard art” as there are ways to impound added vehicles and measures already in place to screen assorted rural collections over a certain proportion. Good fences build good neighbors, but not after you have to report them to the County to get cooperation. Any landscaping to recreate visual barriers costs money and resources—irrigation systems and water, deer and rabbit deterrents, replacement plants, labor for installation and maintenance including poison oak eradication. While participation in the Plan is voluntary, who oversees plan development, implementation, and follow up so that we do not have a subdivision street-view of just homes? The “conditions of approval of the master plan use permit” for the Winchester subdivision states that along roads such Meadow Vista and Sugar Pine, there is to be a buffer of 75’ of natural vegetation, with a landscape plan to recreate such a buffer if any vegetation is removed. How will this dovetail with Shaded Fuelbreaks along routes and ridges? Compliance has been an issue in the past with the project and hopefully the PTEIR will not undermine the County and community’s directives. What will the rest of Meadow Vista look like? Hopefully we will be able to retain our Bird Sanctuary status for many years to come. But when many have expressed concerns and displeasure at the work along Placer Hills Road, and queried “Are they getting ready to widen the road?,” the desired “Welcome to Meadow Vista” falls short of “inviting”.

Re: 14.b & c) Increasing the visibility of archaeological resources such as possible Nisenan bedrock mortars along Wooley Creek and the granite outcroppings on Sugar Pine Mountain could cause increased vandalism, if not trespassing. Who could assist in a more thorough survey of the cultural resources? Let us respect and manage ethically sensitive sites and not desecrate them.

Re: 15.b) “Beware the unschooled public gaining access to fire-sensitive areas.”—Smokey Bear☺

Thank you for your time and responses to my inquiries about the safety and conservation elements of the NOP PTEIR and the ever-evolving fuel reduction program for our area. Hopefully, we can pattern our stewardship of the environment after the Nisenan who did not “own” trees, but tended them.

Sincerely,
(original signed by author)

Patrice Taylor

**PROGRAM TIMBERLAND ENVIRONMENTAL IMPACT REPORT
PUBLIC HEARING COMMENTS**

Date: 7-8-99

Location: Sierra Hills School, Meadow Vista

Issues:

- Potential abuse of "Plan" such as a landowner that comes in and cuts down trees for profit, then moves elsewhere after sale of resources.
- Need for a graphic presentation for the unsophisticated landowner in order to assist the landowner in making informed decisions.
- Concern that the "Plan" will make it easier and less expensive for the sale of timber on private land.
- Looks like the PTEIR picked up where the "General Plan" left off in regards to listed species and archeological resources as the program's review identifies such resources.
- Need clarification if there is a difference in terms "vegetation management" and "fuel load reduction".
- The program seems serious about fuel load reduction.
- What would the impact be to Meadow Vista if this program were implemented on the largest scale possible? How would it impact habitat and what would the ramification be for wildlife?
- The program does not require the maintenance of fuel load reduction after the initial effort.
- Is the implementation phase structured on a time frame or is it self limiting in some way?
- Chipper program's limited use to roads and driveways and not off road creates a burden for the landowner to move slash and debris to the chipper.
- Need to address the problem of invasive species, such as star thistle, taking over in the absence of vegetation that is removed in fuel load reduction efforts.

DEPARTMENT OF FISH AND GAME

SACRAMENTO VALLEY and CENTRAL SIERRA REGION
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Telephone (916) 358-2900



July 27, 1999

Mr. Russ Henly
California Department of Forestry and Fire Protection
Post Office Box 944246
Sacramento, California 94244-2460

Dear Mr. Henly:

The Department of Fish and Game (DFG) has reviewed the Draft Program Timberland Environmental Impact Report (DPTEIR) for the Meadow Vista Vegetation Management Project (SCH# 98042025). This project is designed to allow both commercial timber harvest and understory removal as part of an overall fuels reduction program within the Meadow Vista community of Placer County. The plan area includes about 6,980 acres with an ultimate holding capacity of 2,988 dwelling units and a population of 7,471. The current population of the plan area is about 5,000. The DFG recognizes the complexity of developing such a plan and supports, in concept, this effort.

Existing habitat values within the project area are compromised due to existing urban uses. Future urbanization will continue to degrade wildlife values. The proposed fuels reduction program will not significantly alter this trend. Opportunity, however, exists on the area's larger parcels to enhance habitat values. Additionally, opportunity exists to assure that adequate linkages remain within the plan area, thus allowing for continued animal movement both within the plan area, and to adjacent sites of suitable and available habitat. The retention and enhancement of these existing riparian systems can provide habitat linkages, and protect critical habitats to assure continued animal movement through time by reducing of habitat fragmentation.

As proposed, the DPTEIR fails to incorporate specific and adequate measures designed to assure that direct, indirect, and cumulative impacts to fish and wildlife resources will be mitigated to less than significant levels.

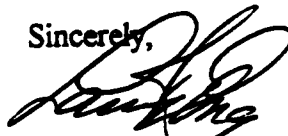
We recommend that the following additional items and issues be included and evaluated in subsequent environmental documents:

- 2 [a. Appropriate measures should be developed to assure that potential impacts to the federally-threatened valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*) are identified, evaluated and fully mitigated.
- 3 [b. Shrub removal within the Water course and Lake Protection Zone (WLPZ) should be excluded on all perennial and intermittent watercourses. The WLPZ should be expanded to a minimum of 100 feet on all perennial streams and a minimum of 50 feet on all intermittent streams.
- 4 [c. Snags posing no direct hazard should be retained within the WLPZ.
- 4 [d. Projects on parcels greater than five acres should retain a minimum 40% of the existing shrub community within that parcel through time. These projects should be designed, where feasible, to incorporate irregular edges and islands consistent with landowner objectives.

We remain committed to assisting you in the development of an ecologically sound fuels reduction program. We believe the suggested measures can significantly enhance the merits of your project, and assure that the area's long-term natural resource values are retained to the maximum extent possible.

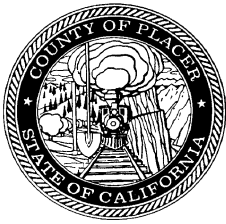
Thank you for the opportunity to review this project. If the DFG can be of further assistance, please contact Mr. Jeff Finn, Associate Wildlife Biologist, at (530) 477-0308.

Sincerely,



Larry L. Eng
Assistant Regional Manager,
Wildlife, Fisheries & Environmental Programs

Mr. Jeff Finn
Ms. Terry Roscoe
Department of Fish and Game
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July 27, 1999

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**SUBJECT: COMMENTS ON DRAFT PROGRAM TIMBERLAND
ENVIRONMENTAL IMPACT REPORT for the
MEADOW VISTA VEGETATION MANAGEMENT PROJECT**

Dear Mr. Henly:

Thank you for the opportunity to comment on the *Draft Program Timberland Environmental Impact Report for the Meadow Vista Vegetation Management Project* (DPTEIR). The Placer County Planning Department offered comments on the Notice of Preparation for this document in a letter to you dated May 14, 1998. These comments listed a number of issues that the PTEIR should address, among them being the effects on wildlife, visual impacts, and enforcement and monitoring of vegetation removal practices. It was encouraging to note that the DPTEIR attempted to address the concerns expressed in our letter; however, the DPTEIR has several serious inadequacies.

Chapter 1 – Project Description:

1. How can the removal of fire hazardous fuels be facilitated under the provisions of the *Meadow Vista Vegetation Management Project (MVMVP)* without inadvertently providing for abuse of the process by those property owners who simply want to realize some monetary return from the trees on their property?
2. Will this Program supercede local land use regulations and allow for commercial logging operations within zone districts that do not otherwise permit "Forestry" uses? Most of Meadow Vista is zoned Residential Single-Family (RS) which does not permit "Forestry" uses.
3. Is expenditure of the Proposition 204 implementation money contingent upon the adoption of the PTEIR?

Chapter 3 – Geology & Soils

4. USGS topographic maps are not sufficiently detailed to provide an accurate representation of the slopes that may occur on an individual lot or parcel. Any implementation measures that rely upon the maps in the DPTEIR for such a determination run the risk of being substantially inaccurate. Will individual slope maps be prepared for each lot that takes advantage of the Program?
5. High erosion hazard occurs on slopes that are much less steep than 50%. 30% is a common slope standard for caution in soil disturbance throughout Placer County. Should not this more conservative standard be used in implementing the Program? Where some more highly erosive soils exist within the Meadow Vista community, shouldn't an even more conservative standard be used (e.g. 20 – 25%)?

Chapter 5 – Visual Resources

6. Although the ability to maintain visual privacy while complying with the Program's requirement to remove vegetation is mentioned several times throughout the DPTEIR, no specific strategies are proposed and no examples are given as to how this can be successfully accomplished. The Program should include a number of very specific examples, formulae and strategies to provide for visual privacy while attempting to meet the intentions of the MVVMP.

The level of significance for the impact to visual resources should be listed as "Significant and unmitigable" due to the lack of a specific prescription that will guarantee the preservation of visual privacy and the protection of existing scenic vistas. The fact that individual property owners may undertake vegetation removal without regulatory oversight in many instances may result in significant and unmitigated destruction of these scenic resources.

Chapter 6 – Biological Resources

7. In order to address a significant concern of the community that was expressed during the adoption proceedings for the Meadow Vista Community Plan, disposal of slash should be limited to chipping or removal. Burning should be avoided so that the residents are not subjected to excessive smoke. The chipped material should be returned to the site as mulch to reduce the erosion hazard potential, to retain soil moisture (thereby enhancing the organic decomposition process), and to retard the growth of noxious native and exotic plants (e.g. poison oak, star thistle, Scotch broom, etc.).
8. In order to avoid the destruction of sensitive wildlife habitat within the riparian areas throughout Meadow Vista, heavy equipment (this term needs a specific and detailed definition somewhere within the implementation measures of the Program) should be prohibited from streamside buffer zones (no exceptions, no crossings).
9. Several places within the document the term "minimum amount" of mature trees is mentioned. What is the "minimum amount" of mature trees? Given various goals and policies of the MVCP to preserve the forest backdrop and the aesthetics of the

forested landscape, shouldn't the "minimum amount" standard be higher for the residential areas of Meadow Vista than a standard that might be appropriate for restocking purposes at a commercial timber production area elsewhere in the County?

10. The discussion regarding the effects of native hardwood tree removal is inadequate in its identification of the importance of these trees for wildlife habitat, wildlife food sources, microclimate temperature maintenance, soil moisture retention, reduction of erosion hazard potential, etc. Especially absent is a discussion of the effects of the loss of black oaks (*q. kelloggii*), a predominant species within the Ponderosa Pine woodlands.
11. In discussing the effects of tree removal resulting from implementation of the MVVMP vs. the effects of tree removal resulting from "urbanization" (an undefined term), the DPTEIR reaches the conclusion that the effects of MVVMP implementation are less significant than those resulting from "urbanization". While the conclusion may be correct insofar as it goes, the real effect to be evaluated by the DPTEIR should be the cumulative effects of both.
12. As thorough as the California Wildlife Habitat Relationships (CWHR) analysis was for the DPTEIR, it failed to address the essential change in wildlife species within the Meadow Vista community. In addition, the analysis needs to assess the cumulative effects of "urbanization" and full implementation of the MVVMP. A more comprehensive discussion of the "improved wildlife habitat" should be provided, including the assumptions of the model, so that an independent review of the data can be undertaken by the DPTEIR reader. As currently constituted, the reader has to accept on faith the fact that the CWHR model is directly applicable to the Meadow Vista project area and that its results have been correctly interpreted by the DPTEIR author. The mitigation measures proposed for the Biological Resources section of the DPTEIR (page 6-26) generated the following questions:
 - (1) Do Registered Professional Foresters (RPFs) have the knowledge to identify any and all listed, threatened or endangered plant and animal species? If not, how can they prevent impacts on these species? If so, how can they prevent impacts on these species (*i.e.* are there specific protocols for dealing with every listed, threatened or endangered species in every situation, or must a qualified wildlife biologist be consulted for a site specific analysis and recommendation)?
 - (2) Who decides the appropriate timing? Do RPFs have sufficient background in wildlife biology to identify actively nesting birds, etc.? Will a RPF actually reschedule logging activity in an instance where a property owner wants to have trees removed and/or if a tree removal crew is available and ready to begin the job?
 - (3) Who identifies these? Exactly what mechanisms are utilized to accomplish this proposed mitigation measure and to insure that any identified areas that are to be protected are not disturbed?

- (4) Who inspects and verifies compliance with this mitigation measure? When?
- (5) How can individual landowners be expected to identify valley oaks (*q. lobata*) as opposed to black oaks (*q. kelloggii*), blue oaks (*q. douglasii*), etc.? What sort of “encouragements” can be offered to a property owner to retain valley oaks? Why only valley oaks?
- (6) Depending upon who decides what is or is not a “public safety purpose” or what is required for “fire protection” or which trees are “dead or dying”, this exception could permit almost any amount of tree removal within any WLPZ. Who makes these decisions? Based upon what criteria? Allowing any encroachment within a WLPZ violates mitigation measures suggested in several other parts of the DPTEIR (e.g. Chapters 3, 4 and 5)
- (7) How is this accomplished? Who decides what silvacultural harvest methods shall be restricted, what is a “significant stand structure”, and if wildlife needs are being satisfied?

Given the discussion above, the level of significance for the impacts to biological resources should be noted as “Significant and unmitigable”.

Chapter 9 – Air Resources

- 2. Please see the comment #7 under the Chapter 6 heading above. The issue of smoke and the dooryard burning of vegetation was a topic of much discussion during the Meadow Vista Community Plan public hearings. Any proposal to increase the amount of smoke that is currently produced within the project boundaries should be noted as “Significant and unmitigable”. The mitigation measures proposed in the DPTEIR depend upon voluntary compliance (there is not a good track record for such compliance in the Meadow Vista area), and the Program encourages the creation of significant new amounts of vegetative material that requires disposal; therefore, there will be a significant and unmitigated impact upon the community.

Chapter 12 – Environmental Information

- 3. The proposed DPTEIR project (MNVMP) cannot be designated as the environmentally preferred alternative. Because the “PTEIR with Reduced Vegetation Management” alternative would, if implemented, result in fewer significant environmental impacts, it has to be the environmentally preferred alternative. The fact that it doesn’t completely accomplish the initial goals of the MNVMP does not rule it out as an alternative that might be implemented if the lead agency has a change of heart. The PTEIR is an informational document to assist the decision-making process. If the decision-making process were to be based upon a policy requiring minimal adverse environmental effects, the “environmentally preferred alternative” would have to be the alternative that results in the least adverse environmental impact.

In summary, the ***Draft Program Timberland Environmental Impact Report for the Meadow Vista Vegetation Management Program*** is generally adequate, except for the issues discussed above, to meet the requirements of the California Environmental Quality Act (CEQA). With the suggested changes, the document should function as an effective source of information to guide the lead agency in its decision-making process.

Again, thank you for the opportunity to provide comments on this important document. Please feel free to contact me if you have any questions regarding the comments offered by the Planning Department.

Sincerely,

(original signed by author)

G. Dean Prigmore, AICP
Asst. Director of Planning

GDP:dp

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cf: Rich Gresham, Placer County Resource Conservation District
PTEIR for the MVVMP file
Chron file

July 28, 1999 C

Russ Healy
Calif. Division of Forestry
1920 20th St.
Sacramento Ca. 95814

Dear Mr. Healy,

The following contains my great concern and comments on the Draft Program Timberland Environmental Impact Report for the Meadow Vista Vegetation Management Project.

1 My two main concerns with ^{the} project is that one, implementation "could result in a change in the visual character of the area" pg. v. How would we ever know how drastic the change could be? This is to much of an unknown and therefore unacceptable in my opinion to take the chance. We live in a beautiful area and we must maintain that beauty, not take it away or degrade it. Use of heavy equipment, logging of dead etc. only ends up as loss of the natural beauty. Loss of property value could also result.

2 My second concern is one in which I cannot give support to the plan with this language in place on pg. 1-4 the sentence which states "Private landowners may be able to harvest trees with commercial value to generate revenue for proper forest fuels management and other purposes". I can't help but question whether there is another plan within the plan and that is to obtain commercial value trees off of private property in the name of making an area more fire safe. I would also ask what is alluded to by the phrase "other purposes"? Meadow Vista does not want to lose its trees and to put the

2
(cont.)

idea "out there" that money can be made by cutting these trees is extremely scary idea!

If our homeowners are to be educated in fire-safe methods, the cutting down of marketable trees must not be a part of the program. Only obviously dead trees or groups of tightly packed trees should be considered for removal or thinning.

On pg. 6-27 #5 states, "Encourage retention of Valley Oak areas within the community." I would hope that this statement is strongly encouraged and also plainly state that, all other species of oaks and Pines should also be encouraged for retention in our community. It is this mix of trees that creates the beauty of Meadow Vista.

3
Manzanita and Buckeye and Toyon are important shrub like growth that is important to maintain the beauty of the Area. Drastic removal of these shrubs will, I am sure, allow undesirable growth such as star thistle to flourish. Removal also takes away valuable habitat for the animals we enjoy seeing and living in the Area. Loss of these bushes also cost loss of privacy between neighbors. We live in an Area such as Meadow Vista because of this rural environment and privacy.

4
I am advocating for the Meadow Vista Area the Reduced Vegetation Management Alternative. Less vegetation would be removed with less land disturbance, fewer impacts to wild life, reduced visual impacts and reduced potential for air quality impacts. The area would remain and maintain the look of the natural landscape we all live here for. High fire potential has not proven an obstacle to growth. Elected officials keep approving growth in these areas as well as in floodplain areas of earthquakes, tornadoes, hurricanes etc.

4
(cont)

People that live in all high risk areas cannot be protected completely and most live in these areas with that in mind.

For the Meadow Vista area I would advocate strategically placed shaded fuel breaks that would protect to some extent the areas adjoining them. I would start a vigorous program of education of our homeowners to create a defensible space around their homes. I would not advocate defensible landscapes practices except in areas where for instance manzanita is so tightly packed the person cannot walk through. Thinning should then be done without great disturbance to the ground beneath and all stumps should be kept to grow level. Protection of all native tree species should be a top priority with only removal of dead or thinning of tightly packed trees encouraged when creating ^{the} shaded fuel breaks or defensible space. These have many benefits to our area such as creation of shade, provision for wildlife habitat, they help filter out pollution and create a beautiful area. These also filter out neighbors lights at night and you actually see the stars from your own yard if you choose darkness over light.

To conclude, we in Meadow Vista have chosen to live here because of the rural and natural environment. We realize the dangers of wildfire. We also realize that you cannot have it all. We cannot have a high level of safety and retain all the other features that we so greatly enjoy in Meadow Vista.

Sincerely,

Noona Ford
204 Black Oak St
Auburn, Ca
95602

PATRICE TAYLOR
3223 SUGAR RIDGE ROAD, MEADOW VISTA, CA 95722
(530) 878-7236 e-mail: ecotypes @ foothill.net

July 29, 1999

Russ Henly, Policy Analyst
The Resources Agency
California Department of Forestry and Fire Protection
1920 20th Street
Sacramento, CA 95814

SUBJECT: Comments on the June 3, 1999 Draft Program Timberland Environmental Impact Report for the Meadow Vista Vegetation Management Project

Dear Mr. Henly:

In addition to my still unanswered questions and comments on the "Notice of Preparation of a Draft Program Timberland Environmental Impact Report" dated May 12, 1998, which are now included in the June 3 Draft PTEIR, I would also like the following comments and concerns about the Draft PTEIR dated June 3, 1999, addressed.

If the community of Meadow Vista's "vegetation" is to be the first "guinea pig" for such a streamlined paperwork and reduced-cost management program as presented in the PTEIR, it is of great concern that the public hearings have not been well attended. For this "volunteer" program to be successful, public understanding and awareness is critical. It is troubling to believe that such a lengthy document with still uncompleted items as the Special-Status Plant Species study for MV would be "the" tool for individuals much less the Registered Professional Foresters that are to help implement the plans that will affect the entire community. The July 8, 1999, public hearing on the Draft PTEIR of June 3, 1999, was attended by just 6 "public" (non-agency) people, and even those few have been previously involved in the process. It is indicative that the present document/PTEIR still does not clarify, mitigate or resolve many issues as the "Public" in attendance still has concerns after this Draft PTEIR of June 3, 1999, supposedly addressed their initial comments made on the May 12, 1998 NOP Draft.

Why is any part of the American River Watershed going to be "treated" (ex. fuel load reduction, shaded fuel breaks) under Prop.204 prior to any monitoring or studies of the current Watershed which might identify why the water reaching the Delta is of such high quality? Implementing this Vegetation Management Plan puts the cart before the horse, a practice that will possibly cause irreparable, at least in our life time, damage the present health of the Watershed. Studies (see Science June 11, 1999) in Southern California indicate that past fire suppression practices and current fuel reduction treatments still need to be assessed before wide-spread implementation, and its high cost is incurred. What such studies exist, or need to be done and when will they be conducted, for our Watershed?

Not only is there a need for pre-treatment monitoring, but also post-treatment monitoring and response—not just for any mitigation that takes place, but long-term evaluation for modifications and corrections to the plans in the future. This is not clearly addressed in the PTEIR. For

example, the overall affect of the use of herbicides and pesticides for the control of unwanted “new pests” of the plant and animal varieties is not mitigated. I can not imagine that the gardeners of Meadow Vista will be thrilled that there will be an habitat increase of 420% for Broad-footed Moles (see PTEIR 6-24)—perhaps in those new lawns for fire resistant plantings. Like any new subdivision plopped in or on the edge of grasslands, poisoning and trapping to eliminate the pest will occur. What residues will affect the runoff and soil organisms? What will move in when the mole population is decimated? Nature does not leave voids, so care should be taken to replace a “Wanted” in the place of an “Unwanted” producer or consumer in the chain! Will the specifics be provided to the landowner by the RPF? How about an appendix with post-treatment plans offered by a “team” of wildlife biologists, native plant specialists, landscape designers along with the RPF who are conducting the modifications to the landscape in the first place?

Will there be an increase in man/equipment started fires? Maintenance of brush-free areas is usually to weed-eat or mow grasses, and historically, not always at the safest time in a fire season. Just what will that increase mean to local fire districts, homeowners’ insurance premiums, etc? Recent control and prescriptive burns that have leapt out of control have the public skeptical of these maintenance methods, too, whether specifically for star thistle control or general fuels reduction.

Tree “number” (population/coverage) reduction and its impact on air quality has not been mitigated. Already in the Meadow Vista area, tree communities have been greatly reduced by the Winchester Project. PG&E also plans to do major removal of trees near and under power lines in our community (also in the name of fire prevention) both along roadways and on private property once they obtain approval, projected by the end of July, 1999. Has the PTEIR anticipated and included these impacts in not only its habitat, soil and water retention mitigations, but also in the air quality mitigations? A mature tree can process about 14 pounds of carbon dioxide per year. With 16.68 pounds of CO₂ produced per gallon of gasoline burned, the number of car trips from Winchester alone will increase the number of trees needed dramatically. With Placer County’s projected population increase, as well as those of Northern California Counties in general, the ozone layer and the pollutants blown over Placer County foothill regions will be ever on the increase.

In light of the County General Plan and the Meadow Vista Community Plan as well as the more recent efforts of the Placer Legacy/Open Space Committee, it is difficult to see that there can ever be an implementation of a fuel load reduction project that will not affect irreversibly the rural character--habitats, biodiversity, air and water quality, scenic corridors and viewsapes, etc.--of the Meadow Vista. Urbanization may be the “greatest threat to wildlife habitat”, but despite the retirement homes, residences both primary and secondary, and businesses that have been introduce slowly into this “interface” with the mixed oak and pine forest, the wildlife community of deer, fox, coyote, raccoon, skunk, lizards, birds, pink glow worms, etc. to date have seemingly been able to adapt. Vegetation for screening between houses and roadways, open space and even the scenic corridors have provided their shelter, nesting and food sources—all of which will be heavily impacted by the proposed vegetation management project, especially over its shorter time span if it is to be effective as a measure to reduce a catastrophic wildfire. Removal of native plants is swift; to replant in a defensible landscape where the soils and plant relationships have been modified is at best a slow and chancy proposition so more than likely, exotics will be introduced further modifying wildlife habitat. What a way to increase biodiversity in an area!

I have a question about the CWHR “trade-off” species lists—just where will a reptile, a Coachwhip (snake) “come from”? It is not listed in Storer and Usinger’s Sierra Nevada Natural History, or in The Outdoor World of the Sacramento Region (Sacramento County Office of Education). When asked, local foresters and CDF personnel are not familiar with such a reptile, so part of the PTEIR should be a picture ID chart of CWHR predicted newcomers. Should this list be reviewed for relevance and likelihood in light of a Special-Status Wildlife Species study specifically for Meadow Vista?

Because this is a “new” design for a PT plan, I appreciate your efforts to address specifically my, and others’ concerns and incorporate the answers to make this an EIR as complete a document as possible prior to any certification.

If you have any further questions for me, please do not hesitate to contact me (see letterhead).

I trust that the e-mail with the attachments did arrive! These “hardcopies” are following the e-ing.

Sincerely,

(original signed by author)

Patrice Taylor

enclosures